

E-01575A-09-0429



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OPEN MEETING AGENDA ITEM  
ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM

Investigator: Carmen Madrid

Phone:

Fax:

Priority: Respond Within Five Days

Opinion      No. 2014 - 119496

Date: 10/31/2014

Complaint Description:      19S Solar  
08A Rate Case Items - Opposed

ORIGINAL

Complaint By:      First:      Last:  
Louis      Woofenden

Account Name:      Louis Woofenden

Home:

Street:

Work: (000) 000-0000

City:      Tucson

CBR:

State:      AZ      Zip: 85705

is: E-Mail

Utility Company:      Sulphur Springs Valley Electric Cooperative, Inc.

Division:      Electric

Contact Name:

Contact Phone:

Nature of Complaint:

\*\*\*\*\*DOCKET NO. E-01575A-09-0429\*\*\*\*\*

From:      Util-PublicComment  
Sent:      Thursday, October 30, 2014 3:52 PM  
To:      Util-PublicComment  
Cc:  
Subject:      Public Comment.

RECEIVED  
2014 NOV - 3 A 10: 04  
ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

Name:      Louis Woofenden  
Date:      10/30/2014  
Address:  
Phone:  
CityStateZip:      Tucson AZ 85705  
Cell:

Docket:      Petition to Amend Decision 71463 Pursuant to A.R.S. 40-252  
DocketNo:      E-01575A-09-0429  
Utility:      Sulphur Springs Valley Electric Cooperative  
Position:      Con  
Email:

Arizona Corporation Commission

DOCKETED

NOV 3 2014

Comments:

DOCKETED BY

Dear Commissioners,

I'm writing regarding Docket No. E-01575A-09-0429, Sulphur Springs Valley Electric Cooperative's petition to amend Decision 71463 to eliminate the March true up-option for new net metering customers. Net Zero Solar is a solar installation business based in Tucson, Arizona, serving southern Arizona since opening in 2008. We have done many installations in SSVEC's service territory, and continue to install solar electric systems in these

# ARIZONA CORPORATION COMMISSION

## UTILITY COMPLAINT FORM

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areas. We have discussed net metering, true-up month, and related design choices with hundreds of SSVEC customers in Cochise, Santa Cruz, and Pima counties. We can agree with staff and SSVEC that consumer knowledge of net metering and the true-up process is often minimal, and requires each solar installer spend time educating potential customers, and providing ongoing information as customer questions arise. We also understand the potential burden this places on SSVEC. Their October 2013 revision of their Net Metering Application (<http://www.ssvec.org/wp-content/uploads/Revised-Net-Metering-Application-October-2013.pdf>), and their How to Read your Net Meter Billing document (<http://www.ssvec.org/wp-content/uploads/How-to-Read-your-Net-Meter-Billing-2014.pdf>) has increased clarity in these areas, and seems a step in the right direction. Notwithstanding these challenges, our experience is that a March true-up option provides benefit to a significant number of net metering customers, and should be retained as an option. To date, about 43% of our SSVEC customers have chosen to use the March true-up as it better matches their energy usage patterns. Each customer's situation is different, however, some common reasons for using the March true-up are as follows: .

Customers are at a high elevation, and use little or no electricity for summer cooling. However, they use a considerable amount of electricity for heating in the winter. Therefore, they would have a large amount of excess generation with a September true-up, and would have a reduced financial benefit why they are paid avoided cost for their excess generation. . Customers are seasonal residents, spending winters in southern Arizona, and summers elsewhere. Therefore, they build up a large amount of excess generation over the summer months, and would have reduced financial benefit if they are paid avoided cost for their excess generation based on a September true-up. It is clear that removal of this option will negatively affect many new customers going forward, especially those who wish to offset most or all of the volumetric charges associated with their electricity use. To meet the current expectations of the financial benefits provided by net-metered solar electric systems, most future consumers would probably elect to considerably reduce their solar electric system size. Again, we urge you to consider the very real benefits the March true-up option provides SSVEC customers, and reject SSVEC's petition.

Regards,  
Louis Woofenden Owner/Engineering  
Director Net Zero Solar  
Tucson, AZ  
\*End of Complaint\*

### Utilities' Response:

### Investigator's Comments and Disposition:

Opinion noted and filed in Docket No. E-01575A-09-0429. closed  
\*End of Comments\*

Date Completed: 10/31/2014

Opinion No. 2014 - 119496

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# ARIZONA CORPORATION COMMISSION

## UTILITY COMPLAINT FORM

**Investigator: Carmen Madrid**

**Phone:**

**Fax:** 202 295 5600

**Priority: Respond Within Five Days**

**Opinion      No. 2014 - 119488**

**Date: 10/31/2014**

**Complaint Description:** 19S Solar  
08A Rate Case Items - Opposed

**First:**

**Last:**

**Complaint By:** Steven Scheumann

**Account Name:** Steven Scheumann

Home:

**Street:**

**Work:** (000) 000-0000

**City:** Sierra Vista

**CBR:**

**State:** AZ **Zip:** 85650

**is:** E-Mail

**Utility Company.** Sulphur Springs Valley Electric Cooperative, Inc.

Division: Electric

**Contact Name:** \_\_\_\_\_ **Contact Phone:** \_\_\_\_\_

**Nature of Complaint:**

\*\*\*\*\*OPPOSED\*\*\*\*\*DOCKET NO. E-01575A-09-0429\*\*\*\*\*

I do not support this proposed amendment. First, if you heat with electricity and have little air conditioning load, a September true-up can be a big disadvantage, as much of your spring and summer excess generation would be credited at the low avoided cost value at true-up. A similar pattern exists for seasonal residents who reside in Arizona in the winter. Typically, these effects become worse as you get closer to a net zero energy usage. Second, the reasons SSVEC gives for the amendment can easily be mitigated by SSVEC. The SSVEC customer confusion on when they true-up can be mitigated by an education campaign and by including a reminder on the monthly bill, for instance. The same basic tactics can be used to address the installer issues SSVEC raised. The SSVEC installer confusion on when the March true-up option can be mitigated by an education campaign, by enhancing the forms (include statement the customer must sign that acknowledges they have considered both true-up options and clearly indicate if the customer has any question to contact SSVEC - provide name and contact information), and by a better review of the forms by SSVEC personnel (ensure true-up month option checked and return if not - the same goes for the customer acknowledgment considering both true-up options), for instance. Third, I think dropping the March true-up option makes getting solar panels less viable to some users. Finally, I am a September true-up user and I am not confused by when my true-up occurs.

**\*End of Complaint\***

### Utilities' Response:

**Investigator's Comments and Disposition:**

Opinion noted and filed in Docket No. E-01575A-09-0429 . Closed

**\*End of Comments\***

**Date Completed: 10/31/2014**

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Opinion No. 2014 - 119488

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